

SUSTAINABILITY STATEMENT

The Board of Directors of Landmarks Berhad (“the company”) is committed in integrating economic, environmental, social and governance (“EESG”) matters in the development of the sustainable strategy for the Landmark Group’s (“the group”). Our sustainability frameworks are aligned with our core values and business strategies with a constant push for performance improvements as our business grows and evolves year after year. This report highlights the systems that have been developed

Sustainability sits at the heart of everything we do, and is a vital component of our business strategy. Our sustainability journey is an ongoing self-renewing process that we constantly strive to improve to do better to fulfil our commitment to our various stakeholders. Data for each material topic has been compiled with integrity, summarising the importance, scope, management approached and targets. The report has been prepared utilising the Global Reporting Index (“GRI”) Standards as a guiding principle while we embarked on aligning our values to five of the 17 United Nations Sustainable Development Goals (SDGs). This is emphasised on Good Health and Wellbeing, Decent Work and Economic Growth, Reduced Inequality and Life on Land way of doing business.

Our goal is to provide our customers with world class products and services that exceed their expectations whilst minimising the harmful impacts on the environment and local communities with care for the wellbeing of our staff. Collaborating also with our hotel operators Marriott International (“Marriott”), we embrace the “Serve 360: Doing Good in Every direction” in our hotel operations. As a Group, our fundamental sustainability framework reflects the triple bottom line (“TBL”) approach where we place People, Planet and Profit or Prosperity is at the heart of our goals, truly reflecting our Vision:

“To be a leading player in the Lifestyle Sector focusing on resorts, hospitality and wellness in the South East Asian region”

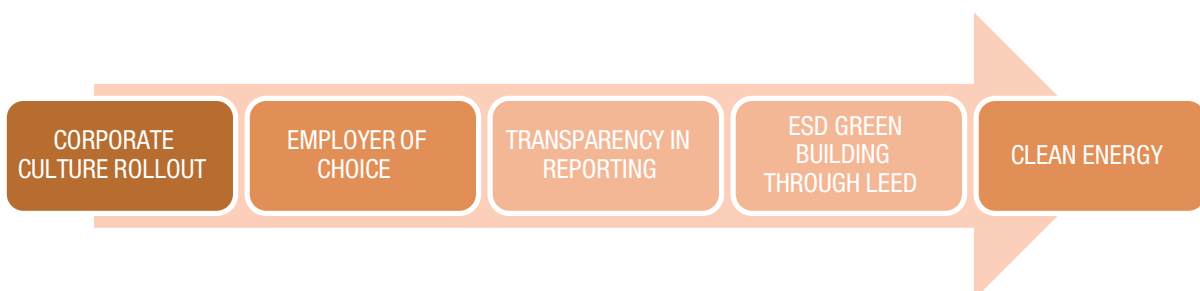
As the journey towards sustainable future continues for us, our stakeholders will continue to remain important to us.

The year 2021 continued with prolonged-pandemic-driven lockdowns and new variants that impacted on further border closures, travel restrictions and business interruptions. While the pandemic caused profound impacts on the business aspects, it also offered opportunities for The Group to contribute meaningful, authentic initiatives with all its stakeholders to build stronger, lasting bonds compared to usual.

As a company, we have intensified our efforts to revamp our corporate sustainability strategy and have formalised an ESG Steering Committee (“ESG Committee”). Guided by an Independent Advisor, Senior Advisory Council and Board of Directors, this committee aims to be proactive and develop progressive approaches to advance our sustainability agenda in the long term.

Vision toward carbon net zero

The Group has outlined a three-year road map: “ESG 2025 GOALS” with a firm intention to gradually increase its alignment to more UN SDG’s, focusing on becoming a Carbon net zero by 2030, with year- on- year improvement on carbon footprint and to include TCFD (Climate-related Financial Disclosure) by enhancing our transparency on these important issues. All of which is possible with a culture that is aligned to our Vision and Core Values as a Group



Sustainability Statement (Cont'd)

The ESG committee will begin in 2022 with a corporate culture rollout of the 3 R program. Creating a culture by making a conscious effort to reduce its impact on the environment by inculcating responsible waste management and accountability towards greener operations in the following areas

- Waste separation - organic and recyclable waste, collection of toxic and e-waste, recording of waste and set KPIs to reduce waste
- Blacklisting products such as single use plastics throughout its operations
- Recording quarterly emission across the value chain ie: paper, water and energy usage, data on travel mileage, waste and effluents emissions
- Rain water harvesting
- Digitalising systems

Stakeholders

As a responsible corporate citizen, the Group's goal is to operate its businesses in a responsible manner whilst advancing the interests of its stakeholders which have primarily been identified as investors, guests, employees, suppliers and the local communities where the Group operates in. The mechanisms that the Group uses to deliver its sustainability strategy include policies, management systems, audits and codes of conduct, amongst others.

References and Guidelines

Our fundamental sustainability framework reflects the TBL approach placing People, Planet and Profit/ Prosperity which includes the practice of 3Rs (Reduce, Reuse and Recycle) that is truly reflective of our vision and mission.



Triple Bottomline Approach

Principal guideline GRI (Global Reporting Initiative) issued by Bursa Malaysia for Malaysian Companies as a key guideline to measure performance.

17 United Nations Sustainable Development Goals (UNSDGs) to identify and align our sustainability agenda toward a globally meaningful role. The Group is aligned with five of the UN-SDGs goals: Good Health and Wellbeing, Gender Equality, Decent Work and Economic Growth, Climate Action and Life on Land. We are working towards aligning with more.

3R- Reduce, Reuse, Recycle is our internal campaign and guiding principal toward reducing our carbon emissions to net zero

In addition to that, The Group also collaborates with its hotel operators – Marriott by actively supporting and funding its International's "Serve 360: Doing Good in Every direction".

Sustainability Statement (Cont'd)

MATERIALITY MATRIX

GRI 102-11, 102-29, 102-47, 103-1

Materiality is defined by the Bursa Malaysia Sustainability Reporting Guide as the principle of assessing a range of sustainability matters and identifying those that are most important to the organisation and its stakeholders. The materiality study prioritised areas that have significant:

- Impact on the economy, society and environment; and/or
- Influence on the decision-making of stakeholders.

The Group has developed a robust framework on these lines that integrates both non-financial and financial risk and connected closely with business operations that targets from its Economic objectives with the three main pillars of sustainability: Environmental, Social and Governance whose respective factors are identified as the focus areas in the chart below.

Economic	Environment	Social	Governance
Empowering communities	Mitigating climate related risk	Advancement of Human Rights	Best Practices of law and regulation
Employment	Water, Energy, Paper Consumption	Occupational Safety & Health	Corporate Governance
Procurement	Biodiversity & Conservation	Diversity & Equal opportunities	Compliance
Community Investment	Managing Waste & Effluents	Employee Wellbeing	Policies
	Clean Energy	Preferred Employer	Managing Risks

Sustainability Statement (Cont'd)

Alignment and focus on 17 UN SDGs

GRI 102-31

The Landmarks Group contributes economically to global sustainable development through the strategies and contribution in each of the five areas of focus areas presented in the chart below.

Sustainable Development Goals		The Group's Contribution
SDG 3 Good Health and Well-being	Ensure healthy lives and promote well-being for all at all ages	<ul style="list-style-type: none"> - Prioritising health and safety for our stakeholders in our business operations by adopting international standards of best practices and guidelines - Promote healthy lifestyles focused on care for the employee well-being and raising awareness on individual health and fitness.
SDG 5 Gender Equality	Achieve gender equality and empower all women and girls.	SDG 5 Gender Equality
SDG 8 Decent Work and Economic Growth	Promote sustained, diverse and inclusive employment opportunities in a safe, progressive environment	<ul style="list-style-type: none"> - Providing safe, nurturing environment for work and upholding equality, fairness and respect in the workplace through strong corporate governance and policies - Increasing the capacity of local communities to pursue sustainable livelihood opportunities by empowering them with employment opportunities and entrepreneurship opportunities thus they are able to contribute to the development of the national economy - Supporting underprivileged groups through philanthropic activities

Sustainability Statement (Cont'd)

Sustainable Development Goals		The Group's Contribution
SDG 13 Climate Action	Taking proactive actions to combat our carbon footprint and consumption impacts on climate change	<ul style="list-style-type: none"> - Progressive steps taken to carbon footprint - Digitisation of systems to improve cross border efficiency, communications and reduce paper dependence - Reduced business travel by switching to online platforms - Procurement policies to increase local vendors / content supply to reduce imports - Manage food, oil, garden and toxic waste to landfill and methane production through
SDG 15 Life on Land	Restoration and conservation of ecosystems and halt the loss of biodiversity, protect and prevent the extinction of threatened species	<ul style="list-style-type: none"> - Mangrove replanting and reforestation efforts. - Placing great emphasis on education and conservation through Mangrove replanting initiatives, biodiversity conservation of our rainforests and investing into rebuilding Turtle sanctuary and coral reproduction. - Promoting organic farming and low carbon food, composting of food waste and

Reporting Scope and Coverage

This report covers sustainability performance of all strategic businesses units listed. The Landmarks Group consolidated financial statements in Malaysia, Singapore and Indonesia. We also include sustainability initiatives where we have partnered with directly or supported such as local government, communities and vendors within the report.

Reliability

This sustainability statement has not been verified by an external party. However, it has been reviewed by the ESG committee the internal audit team, management and Board members for its accuracy and credibility. This Sustainability Report was made in accordance with a resolution of the Board of Directors dated 23 February 2022.

Sustainability Statement (Cont'd)

References

All references to 'Landmarks', 'The Group', 'The Company', 'we' and 'our' refer to Landmarks Berhad.

Forward looking Statements

This report contains forward-looking statements such as targets, prospects, plans and reasonable expectations made in terms of expected performance. Such forward-looking information has been made based on presently available data and information as well as current operating environment conditions. These are subject to change based on a wide range of developments that are beyond the Group's control. Readers are advised not to place undue reliance on such statements as our business is subject to risks and uncertainties beyond our control. Actual results may differ.

Reporting Period

This statement discloses all relevant information for the financial year 1 January 2021 to 31 December 2021 corresponding to the period covered by our Annual Report for the parallel year.

SUSTAINABILITY APPROACH

The Group views ESG as a top- down strategy that requires the vision and direction to be driven by the ESG committee through the various specific roles at each level within the company and the Group. Our sustainability governance structure includes an Independent Advisor and an ESG committee that will develop a proactive and progressive approach to promote and advance our sustainability agenda in the long term

<p>The Board of Directors (Board) is the governing body that sets and oversees the organisation's sustainability framework, comprising sustainability vision, mission and strategic approach based on the Economic, Environment, Social and Governance (EESG) risks and opportunities are evaluated and that internal control policies and procedures are in place to safeguard compliance and to protect the Group's assets. The Board delegates the responsibility to the Sustainability Steering Committee to supervise and manage the overall sustainability implementation across the organisation.</p>	<p>The Leadership Council consists of the Chief Executive Officer ("CEO"), reporting to the Board, and the Group Chief Operating Officer, who is responsible for implementing the strategies in the respective business units to support the CEO in overseeing the progress of the Group's sustainability efforts.</p>
<p>The Advisor is an independent director who is knowledgeable in all governing aspects and forming the ESG Steering Committee by selecting its core members. The role is to ensure the consistency of metrics, methodologies are aligned to globally-accepted standards and to manage risks associated with a missing data, non- compliance to guidelines that can result in "greenwashing". The advisor also conducts ESG assessments such as stress tests twice a year and provide guidance climate-related risks identification and integration into overall corporate risk management processes</p>	<p>The Steering Committee's role is to support The Group's commitment to EESG by proactively engaging with Heads of various departments to obtain environmental-related data and information for recording as well as to identify any policies, standards, guidelines and procedures related to sustainability which may (and may not) be currently implemented yet. The committee is also responsible in forming the framework and disclosures, and monitoring the overall progress of the Group's sustainability performance moving forward, providing recommendations for improvement.</p>

Sustainability Statement (Cont'd)

SUSTAINABILITY STRUCTURE

BOARD OF DIRECTORS		
SENIOR LEADERSHIP	Mark Wee, Group CEO	
ADVISOR	John Ko	Independent Director
COMMITTEE:	Jasvinder Kaur	Group Head of Communications, Wellness and ESG <i>GRI Certified</i>
	Tan Kia Joon	Project Management <i>Overlooking ESD (Environmentally sustainable design) buildings and development</i>
	Ong Jiin Shan	Project Development Division <i>Redevelopment of The Andaman Langkawi</i>
	Nana Pardianawati	<i>Director of HR & Admin, Treasure Bay Bintan</i>
WORKING COMMITTEES		
<p>Consist of sustainability champions on the ground, consisting of passionate individuals who volunteer or are appointed by HODs as or appointed by HODs as marshals, OSHA committees, Sports & Recreation Clubs etc. On the operations level, the working committees are to obtain the sustainability agenda and KPI's from the Steering Committee and plan, execute, monitor and report the performance of the action plans to the Steering Committee by compiling and submitting information, data, photos, etc. from all relevant departments promptly to the Secretariat for the preparation of the annual Sustainability Report.</p>		

The Communications and Public Relations Department has been tasked as the secretariat to manage and consolidate the various functions of the ESG committee.

We are indeed grateful for the outstanding support received from our teams and subsidiaries who are key to the future success of our corporate sustainability goals and strategy. We are hopeful that efforts to advance our sustainability agenda will enable us to nurture sustainable practices in our corporate culture, and further strengthen our position and reputation in the industry as an ESG sustainability practitioner.

RESPONSIBLE SUPPLY CHAIN MANAGEMENT

GRI 102-9, 102-10

The Covid-19 pandemic has catalysed a renewed interest in this area. The disruption of the global supply chain has forced consumers towards more responsible and prosocial consumption that has much to do with nationalism and socio-economic impacts. For us, procurement policies have always been to nurture relationships with key suppliers and to create a corporate ecosystem infused with ESG considerations that are able to provide competitive edge in cost, delivery, quality, technology and human resources in order to maximise synergy, speed and efficiency with suppliers that enables sustainable growth

The Group practices "Equal Employment Opportunity Policy" and subjects to ESG considerations protects potential vendors and recipient organisations from discrimination during the procurement process. Assessing suppliers helps manage environmental, human rights and other sustainability risks in the supply chain. Social and environmental risk assessments on potential and existing suppliers, especially those that are considered 'high risk', are conducted as part of the due diligence.

Sustainability Statement (Cont'd)

Conduct expected from suppliers



Economic Value Creation

GRI 201-1

While the procurement functions and processes in the Landmark's Group are managed under several different teams across its operations, a Central Procurement Department has been set up in efforts to increase efficiency and reduce risks associated with purchasing and supply management. The function of this Department is to:

1. Constantly review with ESG considerations the processes and seeking better ways to support local vendors
2. Ensure that international standards and regulations be followed in the areas of human rights management, work environment and ethics by vendors
3. To build an open, transparent and accountable management system that sustainably engages all stakeholders along the supply chain.
4. Lower supply chain carbon footprint by striving to work with suppliers who are eco-friendly.
5. Constantly seek and qualify local vendors for any goods or services

For other capital goods and services for resort development and recreational activities, some items are still being sourced from Singapore, China and other parts of Indonesia for cost efficiencies and the availability of a wider range of supply. Regional or Group Contracted rates with preferred suppliers and Marriott partners that offer preferred rates, servicing agreement and guarantees

Sustainability Statement (Cont'd)

ENVIRONMENTAL

Current environmental challenges include climate change, increasing energy demand, scarcity of raw materials and waste disposal practices. These issues challenge global businesses to rethink their processes and shift towards sustainable development.

The Group has always been conscious of its corporate responsibility to manage the impact of its business activities on the environment and is committed to continuously improve its impact by reducing its carbon footprint and greenhouse emission and maintain an eco-friendly operation by actively reducing emissions and using water and other natural resources efficiently. The Group incorporates innovative technologies and methodologies.

All our resort stays true to the promise of being an eco-friendly from design incorporating recycled, upcycled and natural elements into the architecture and designing. Using mobile architecture in Treasure Bay Bintan (“Treasure Bay” or “TBB”), tented eco-resort that provides the highest levels of comfort and extraordinary experience by utilising the unique concept of accommodation with canopy tents. This concept requires the lightest possible carbon footprint with no piling work and minimal construction work in building or in demolition. The tented resorts can pack up and move from one location to another leaving no permanent footprint on the site. The concept of these no frills eco-resorts have become much sought after choice of accommodation by the new emerging emitter markets looking for adventure tourism. This offers a change to the traditional sea, sun and sand holiday makers who prefer exciting, local experiences such as site seeing, wellness, cultural and gastronomic experiences rather than bespoke activities and experiences. Natra Bintan, a Tribute Portfolio Hotel is Marriott International’s first evert tented resort while ANMON that officially opened its doors in 2020, is the first dessert themed resort that is much focussed on events, art and food and beverage experiences.

Our efforts in championing green development has been acknowledged internationally with awards such as ASEAN Green Award (March 2010) presented at the 2010 ASEAN Travel Forum, ASEAN Green Hotel award at the 2011 ASEAN Tourism Forum, International Hotel Awards 2011 in association with Bloomberg Television – Best Sustainable Hotel (Malaysia), ASEAN Green Award (January 2012) presented at the 2012 ASEAN Travel Forum, International Hotel Awards 2012 in association with HSBC – Best Sustainable Hotel (Malaysia) and Best Spa Hotel, Hotel Club Awards 2012 – Top Green Hotel (Malaysia), International Hotel Awards 2013 – Best Sustainable Hotel (Malaysia) and most recently the ASEAN Green Hotel Awards 2014 and Best Environmental Sustainability Hotel 2014 by Starwood Hotels & Resorts Worldwide (“Starwood”) Asia Pacific Division.

Sustainability Statement (Cont'd)

Biodiversity protection

GRI 304-1, 304-3, 304-4

As Biodiversity is linked to well-being, and being part of the ESG factors, we recognise that a polluted environment can produce adverse impacts on the health and quality of life. The effects of climate change and other environmental issues may also impact our business. We continue to work on minimising the impact of our business activities on the environment and human health by striving to integrate conservation effort SDG 14 Life Below Water & SDG15 Life on Land.

With ESG considerations in mind, environmental protection is an intrinsic part in the Group's projects. Upholding sustainability in every aspect of its development, the Group demonstrates its commitment toward sustainability in the heart of every decision made via local sourcing where possible for its construction and further exploring opportunities to do business with local companies, protecting nature particularly via compliance with laws and legislation to ensure that every aspect of reducing pollution and effective waste management is maximised.

- Marine Life conservation and fund-raising efforts
- Mangrove replanting with local communities
- Promoting public awareness on the importance of the ecosystems
- Rebuilding of Turtle conservation sanctuary in Lagoi, Bintan
- Academic collaboration universities on research and educating young conservation projects
- Educating children by sponsoring trips to the site
- Collaborating with local fishing communities to promote sustainable fishing initiatives such as anti-poaching and supporting local fisherman by buying directly from them

The Group is committed to preserving natural habitats, biodiversity and landscapes and respects legally-designated protected areas, to avoid the loss of national treasures. Working along-side the UN Heritage sites and International Union for Conservation of Nature (IUCN) Red List threatened species, local communities

Restoration and conservation of the environment

The Group because of ESG considerations views biodiversity conservation and restoration as a priority and has started forming local partnerships with parties that share a similar passion in taking these efforts further to make an impact. All resorts elevated are involved in promoting nature and to help increase educate our guests on the ecosystems by encouraging to explore, experience and interact directly with nature.

The Andaman – redevelopment and ESG

The Andaman will undergo redevelopment following the damage cause by the recent fire disaster which resulted in a total loss to the building. Targeted to be completed by end of 2024, the group has allocated RM7 million which is 4% of its total GDV (Gross Development Cost) for ESG related initiatives.

The Andaman is home to a diverse variety of marine life and precious fringing reef said to be 6 thousand to 8 thousand years old. While the 5-million-year old Rainforest is home to rich biodiversity such as the dusky langur, long-tailed macaque, black giant squirrel, great hornbill and Sunda colugo. Conservation forms the core of the United Nations 2030 Agenda for Sustainable Development and the DNA of The Andaman.

During this development, our team will work hand in glove with NGOs, local conservationist and indigenous communities to tap on the inherent knowledge about nature to bolster our biodiversity conservation efforts not only to preserve the environment, ecosystem and wildlife but also to strengthen culture, heritage and local community. The following tactical strategies will drive our aim to cut top-level emissions :

Sustainability Statement (Cont'd)

1. **Development** - An integrated approach to sustainable masterplanning will be applied across all of our developments. Starting from the concept planning and design stage to significantly reduce environmental impacts and resource consumption. conserve and protect natural habitats, ocean and wildlife biodiversity through conservation and restoration efforts as a priority while using the most suitable natural methods causing less damage to environment are being discussed with experts.
2. **LEED Design** - Our architects will promote the biophilic design concept, which seeks to connect building occupants closely to nature by incorporating natural lighting and ventilation, natural landscape features and other elements to create a productive and healthier built environment that consumes fewer resources.
3. **Clean Energy** - We have set clear targets to reduce our dependency on non-renewables and uphold our commitment to transitioning to a low carbon future by enabling renewable energy (RE) as well as employing the following tactical targets.
 - √ Reduce urban planning and development emissions by 35 percent through by using Pre-fab, Pre-finished construction methodology to speed up the rebuilding works, and usage of solar panel and considering PV (photovoltaic) installations where appropriate as power sources
 - √ Reduce operation energy consumption by 50 percent through pre-heated solar water heater, Design Natural Ventilated Common Areas, De-centralized Air-con System with Inverters
 - √ Reduce transport emissions by 10 percent by encouraging hybrid and electric vehicles
 - √ Reduce non-RE consumption by 40 percent
4. **Water Management** - Reduce the dependence of treated water usage by 50 percent by recycling waste water selectively
 - √ Rainwater harvesting systems to be integrated into the Landscape Water Body
 - √ Building catchment ponds for irrigation, toilet flushing, and general cleaning
 - √ Sewerage waste - Utilising ICT technology to purify the water, we are considering the GJ-R integrated management solution system and to build a facility that can clean at a minimum of 10, 000, 000 liters per day
5. **Waste Management** – to reduce waste sent to landfills by 50 percent by recycling, upcycling and restoring
 - √ Solid waste solution – we aim to introduce “The Asher”, a patented technology that enables continuous self combustion without the need for eternal energy such as diesel fuel to dispose waste. This eco friendly solution is EPA compliant and has low running cost. It is able to turn 1 Ton of waste into just 40kg of ashes reducing energy required for transportation and waste to landfills.
 - √ Demolition/construction waste to be sorted for recycling purpose, and to be used for forming platform and terrain.
 - √ Food waste is to be converted to reusable material with the “ORCA”. This system is able to breakdown food waste into water and reduce greenhouse gases, methane generation by diverting an average of 416,100 pounds of waste from landfill per year.
 - √ Turning food waste into fertilizer for farming and for the landscapes – we will build plants where we can convert coffee beans and process dried leaves to turn it into manure.

Sustainability Statement (Cont'd)

Mangrove replanting



Mangroves provide protective greenbelts along coastlines and are proven effective barriers against tropical storms serving as buffers and erosion and are a vital source of nutrients for fish and coral reefs. Mangrove ecosystems also provide livelihoods for coastal communities that depend on fishing as a source of income. In 2012, Treasure Bay initiated a project for mangrove rehabilitation of 23 hectares of mangroves as one of its key activities in TBB. Still on going as TBB's ESG initiative, it is supported by the local community groups of Sungei Kecil, Desa Sebong Lagoi and Kecamatan Teluk Sebong located North-West of Bintan, 21 kilometres by road from TBB.

The International Day for the Conservation of the Mangrove Ecosystem adopted by the General Conference of UNESCO in 2015 is celebrated each year on 26 July. It aims to raise awareness of the importance of mangrove forests. Each year, in the month of July, the staff and management of Treasure Bay Bintan, collaborate with local celebrities, NGO, corporations and local communities to replant seedlings and organise a clean-up in a 60-hectare mangrove forest and river within its enclave. These initiatives aim to bring awareness on climate change and to mitigate its effects through the protection and rehabilitation whilst also creating awareness on the importance of the ecosystem.

Mangrove Nursery



In efforts of restoring the mangrove, a nursery has been added where the seedlings will later be planted to maintain the mangrove ecosystem in its area. A total of 72,000 mangrove saplings have been planted so far.

Recognising and engaging the community

The Group recognises as part of its ESG commitments that mutual growth of the communities in which we operate in is key to its success. Hence it is committed toward improving the socio-economic status of the people in Bintan by embracing the local community, culture and adding value via sustainable sourcing to share the benefit with them.

- Creating jobs and providing opportunities for locals to improve the quality of life
- Raising the socio-economic status for the local community by sharing the benefits with them through promotion of local enterprise by working with local suppliers and local sourcing

Sustainability Statement (Cont'd)

Rebuilding of Kampung Baru Turtle Sanctuary



Sea turtles are an endangered marine species according to IUCN Red List of Threatened Species and have become endangered not only due to commercial activities but also due to the lack of education in the coastal communities. As responsible company, we must do the right things to educate our local communities and work toward legislations and enforcing environmental laws that will protect our marine life.

In 2019, TBB signed a MOU with The Territory of Telok Sebong committing a total of IDR160million spending to rebuild of the turtle sanctuary. TBB continues to contribute 100 liters of petrol monthly valued at Rp. 14.460.000

or SGD 1,377. The petrol is used as fuel to run the generators and power for the site. TBB also continues to provide medical coverage for 28 families in this isolated village while social security coverage is provided for 7 of fishermen from the same village who manage the turtle sanctuary. The value of contribution is Rp. 13,171,200 or SGD 1,254 per month



The mission of our Group, with its commitments to ESG considerations is to invest in the welfare of the communities in which we operate in by extending assistance to the local fisherman who we see as the contributors to this initiative. Treasure Bay Bintan has committed to pay contribution of Social Security Coverage (BPJS) for the fishermen of both medical and accident and in the next three years, it is our vision that the turtle sanctuary will become a self-sustaining tourism centre. As such we are building toilets and business kiosks, that we may encourage enterprise within the village and raise the socioeconomic status of the communities here. In doing so we have to ensure that the community has adequate equipment and facilities.

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Organic Park

One of the missions of Treasure Bay aligned to its ESG commitment is to integrate wellness with sustainable operations which incorporates the experience of clean air, water and food. Our organic park is one of the drivers to achieve this mission. From time to time, workshops are held with industry experts and chefs to educate visitors on low carbon food source and the benefits of “farm to table” dining options that is fresher and healthier. The pilot organic park within TBB started in 2016 and has seen more than 90 species of vegetables, fruits and herbs being planted. Its organic produce to-date are shared with our resorts, with excess distributed to staff and local under privileged communities. The farming process was certified to be organic under the International Federation of Organic Agriculture Movements (“IFOAM”) (European Union and Australia) on 13 July 2018. The IFOAM is the worldwide umbrella organisation for the organic agriculture movement that is responsible for accreditation of organic produce.

Operational staff were chosen from the local population in Bintan and provided with training and education to introduce new skills and calling to them. A lesson plan has been established and will be part of the standards to train new staff. This has created awareness and jobs locally within the community. There is potential to seed and engage the local community for start-ups of organic agricultural plots or animal farming outside TBB on Bintan island, which is an attractive proposition for local entrepreneurship or career alongside TBB’s development blueprint. These start-ups can be a supplier of organic food to TBB and Bintan Island.

Sustainable practices have been designed into the operations of the organic park such as a catchment pond that serves not only as a collection point for water but also used for fish rearing and as well as an irrigation. Organic composting is also practiced to produce different organic fertiliser types from different unwanted harvested materials. Plant waste are also recycled by shredding to be used as mulch for protective soil cover and dressing.

Managing Effluents and Waste

GRI 306-1, GRI 306-2

Waste management is a major concern for the communities and local authorities in the locations where we operate. While The Group is consciously and proactively implementing measure to for responsible waste disposal reduction, the overarching objective is to use the resources in its value chain efficiently in order to minimise the volume of waste produced at all locations as part of its ESG commitment.

Year	Paper Waste Recycled	Plastic Waste Reduced	Food Waste Collected	Hazard Waste Collected
2020	12,500KG	500KG	480KG	150KG
2021	500KG	100kg	832KG	Nil

3R Programme – Reduce, Reuse, Recycle is a framework that has been implemented throughout all our operations and administrative offices to instil accountable waste minimisation practices. In 2019, the Group reported a reduction in paper usage by 19% through digitalisation of processes. In 2020 and 2021, paper usage was even more reduced due to remote work and operations shut down by the pandemic. We do foresee an increase as we return to work in offices and on site for 2022.

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Building on this ESG commitment, the Group is now working towards a long - term initiatives to support climate change action by reducing waste to landfill and methane production. Through its Vision toward carbon net zero by 2030, The Group has outlined a three-year road map: “ESG 2025 GOALS” to enforce the following

- Waste separation - organic and recyclable waste, collection of toxic and e-waste, recording of waste and set KPIs to reduce waste
- Food waste footprint measurement throughout its operations
- Blacklisting products such as single use plastics throughout its operations
- Recording quarterly emission across the value chain ie: paper, water and energy usage, data on travel mileage, waste and effluents emissions
- Rain water harvesting
- Digitalising systems

Waste Management Committee



In 2021, a Waste Management Committee was set-up in Treasure Bay to look into organic composting of kitchen and garden wastes with intention to convert it into compost for landscaping and organic farming purposes.

Dry leaves and cut grass are being converted into natural plant compost to be used for our landscapes. The application of compost helps the formation of a good soil structure and increase soil fertility. A total 800 kgs of plant compost fertilizer has been used to fertilize the plants in the garden.



Sewage Treatment Plant water is used to reduce treated water while rain water is harvested in the man made catchment pond where it can be channeled to the Chill Cove area to be used to water plants and maintain landscapes. It is used for flush water in toilets, watering the garden and washing common areas including company cars and busses.

Elimination of Single-Use Materials - Plastic and print material pollution is one of the most pressing threats to the environment. One of our primary goals have been to reduce our dependence and usage by replacing these with biodegradable, repurposed material, reusable or digital alternatives throughout all our operations. Contactless experience has become an inevitable change in hygiene and safety post pandemic and have been adopted as are part of the new normal in our operations to meet health guidelines. This move has triggered The Group's plans to reduce print materials and paper usage as its ESG commitment. To minimise contamination, all menus, brochures and information is now accessible through personal mobile devices by scanning QR codes. The Group plans to implement this throughout its operations in a more formal way when operations resume as post pandemic though digitalising all systems, using devices for paperless check in and encouraging cashless systems.

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Negative listing materials-The various initiatives in this part of the ESG programme include creating a “Negative Listing” of materials to be phase out eventually across all our operations. This includes single use plastics such as drinking bottles, straws, in rooms amenities, brochures, menus, corporate gifts and other office supplies. This also applies to the daily operations in the corporate offices and in all group related events and meetings where responsible use of resources is constantly practiced. Our resort in Langkawi, launched its in-house water bottling plant in 2020 where drinking water placed in guestrooms are bottled in reusable glass bottles instead of single-use plastic bottles. With this initiative, the resort is able to reduce at least 6 single-use plastic bottles per room per day.

Since its inception in July 2019, the resort estimated a reduction of rubbishing at least 50,000 plastic bottles in 2020, or an equivalent to approximately 500 kg of plastic waste avoided.

Moving forward, we aim to track in the negative list for kitchen waste materials such as plastic bags, bottles, straws, gloves, caps, cotton buds, cling film, pastry piping bags, tapes, coffee capsules, condiments, candies and wrappers and to consciously cut down and eliminate or replace with sustainable materials as our ESG commitment.

Repurposing and Upcycling materials such as wood from fallen trees at the resorts to make menu cards, candle stands, side serving stations, place mats and display food trays at the various F&B outlets is creative conversion of junk in addition to reusing the used soap from guest rooms as cleaning materials for rags and old towels as rag for housekeeping purposes. Our teams have also started using materials made of cans, bottles, corks and food waste to make festive decorations and souvenirs for guest.

Third Party vendors and Disposal of hazardous waste – The Group encourages its operations to appoint where possible and available, specialised suppliers and third parties to ensure safe and proper disposal of toxic and chemical wastes. Toner cartridges, Old Computers, Batteries, Oil and machinery parts are disposed in a responsible matter, some with the vendor agreement to offer disposal upon expiry. Cooking oil is also recycled into bio-diesel through a third-party vendor. The Group aims as part of its ESG commitment to now standardise and account for the hazardous waste by monitoring the disposal amounts monthly.

Eco-friendly cleaning products are emphasised as part of the ESG commitment for laundry, housekeeping and stewarding throughout all its resort operations. In addition to that, the Group encourages the use of organic products, working with vendors that provide packaging using renewable energy and sourced ethically and where possible-locally. The Group’s wellness division, V Integrated Wellness, is one of the first in South East Asia to incorporate 100% food grade organic products in its offering and has been recognised with multiple international awards and accolades and ranking for its green and sustainable products and practices.

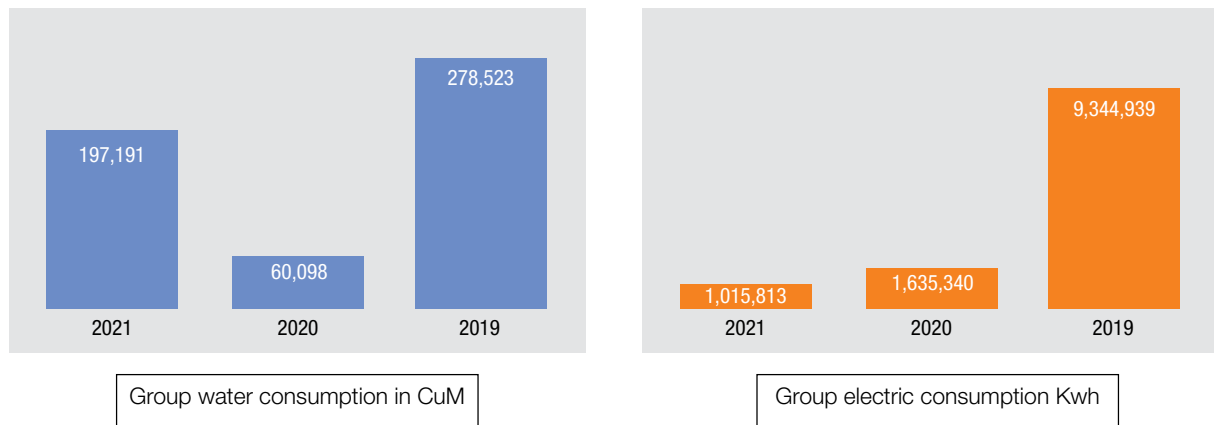
Sustainability Statement (Cont'd)

Environmental Compliance

GRI 307-1

The Group is pleased to report that there have been no instances of noncompliance or action taken by authorities with regards to its environmental actions and performance during this reporting period and has been 100% compliance with local, regional and national environmental laws and regulations.

Group Utilities Consumption



The Group is committed by ESG to protecting resources and improving efficiency, via good management and conservation. We are vigilant about our consumption and make informed decisions based on proven methods and best practices, be it technological enhancements, administrative control measures or encouraging conscientious and ethical behaviour within the company, along our supply chains and customers.

The tables above make comparison pre-pandemic consumption year 2019 with years 2020 and 2021, with lockdowns, reduced operations and closure of The Andaman Resort in Langkawi

Water consumption saw a 74% decrease from 2019 to 2020 due to long shut downs but increased in 2021 due to reopening of business, sanitising of equipment and recommencing of operations.

The same can be said for the Electricity consumption where a 400% decrease is seen from 2019 to 2020, however, it continues to decline in Treasure Bay with the closure of Marine Life Development Park.

Water conservation initiatives

Reuse of linen and towel programme where a card is left in all guest rooms to encourage resort guests to indicate if they would like to participate by not changing them daily.

Rain water harvesting for watering plants and washing of public area floors to reduce the dependence of treated water. The Group intends to invest in waste water treatment plants in all its operations by 2025. This will clean sewage and waste water by removing solids and pollutants, breaks down organic matter and restores the oxygen content before returning it to the environment or use for watering plants.

Energy conservation initiatives

The Group has always been committed as its ESG commitment towards energy savings programmes such as using energy efficient lighting systems with LED (Light-emitting diodes) bulbs as well as optimisation of natural lights through innovative building designs in the offices, carparks, guest rooms and common areas of our operating units. Automated air-conditioning schedules in meeting rooms are used instead of centralised air-conditioning and temperatures at guest rooms are also set to a maximum of 22oC for optimum energy usage.

Sustainability Statement (Cont'd)

Within the operations of our resorts, environmentally friendly form of transportation such as bicycles, battery-powered green buggies, electric bikes, buggies and Segways are provided as a recreational activity and to manage logistics to reduce emission. Lighting in public areas have also been designed with more being planned using solar power and wind turbines as energy sources.

The Group intends to incorporate renewable energy through innovation and smart designs to reduce carbon footprint of our operations by 2025

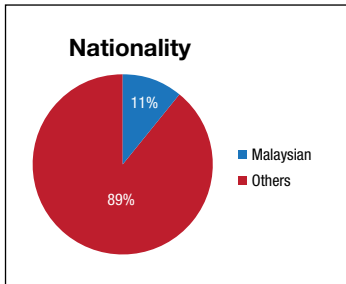
SOCIAL

The Board recognises that one of the Group's most important assets is its human capital. As a responsible employer, we are committed by ESG principles to run a safe, efficient and profitable business where honesty, integrity and respect for people govern the way we work and interact with each other within the organisation and externally with our guests and business partners.

As such, The Group places paramount importance on the health, safety and welfare of its employees, suppliers, contractors and customers in accordance to our Corporate Statement and ESG commitment. We are committed to delivering high standards in health and safety across all aspects of our operations that includes corporate offices, hotels, parks and sites in progress all of which adopted various safety measures from fire and emergency procedures to hazard analysis with a target of zero accidents in all our business units.

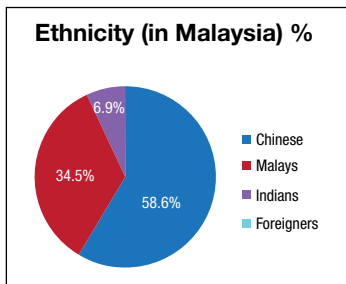
Sustainability Statement (Cont'd)

EMPLOYMENT



The Group continues to provide employment for a total of 321 people in 2021 compared to 620 people in 2020 across its operations in Malaysia, Singapore and Indonesia. 11% of which are Malaysians who are based in its Corporate office in Kuala Lumpur. As the main business operations is in Bintan, Indonesia, 89% of the workforce are Singaporeans and local communities from Indonesia.

Diversity & Inclusion



The Group is aware in the light of ESG considerations that it is vital to manage the differences found within its operations across three countries with its diverse ethnicities, religions, cultures and customs. In addition to managing the complex yet balanced mix of age and gender, we are required to be alert and sensitive in our approach towards equal opportunities for all and our commitment to upholding to zero tolerance towards discrimination on grounds of colour, religion, ethnicity, age, national origin, gender or any other personal characteristics and that are deemed harassment in the workplace with severe disciplinary repercussions.

The selection, recruitment, promotion and training of employees is made based on merit and performance ability. In upholding our commitments to human rights and ethics, we ensure that strictly no child labour, forced labour and discrimination issues are allowed in our businesses and supply chains. We believe these policies are crucial in retaining and attracting talent.

The Group continues to provide employment for a total of 321 people in 2021 compared to 620 people in 2020 across its operations in Malaysia,

Rightsizing the workforce

It was important to stay strongly focussed while building a resilient future to ensure the come-back is greater than the set-back caused by the COVID-19 pandemic and fire disaster.

The prolonged lock downs and border closures worldwide caused by the pandemic has an adverse impact on The Group's operations and revenue overall. In addition to that, a fire at the Andaman Langkawi had resulted in a stoppage of all its operations.

In response, The Group recalibrated its operating structure to manage costs prudently by rightsizing its workforce by re-engineering its processes and cost base to ensure and protect the long-term sustainability of its business viability. The Group has paid a total of RM 8.1 million in severance packages and has retained only core employees at The Andaman.

Total number of employees of the group

Year	2019	2020	2021
No. of Employees	1019	620	321

The Group foresees the future of work and hiring policies for the medium to longer term recovery post pandemic will shift to a demand-led employment strategy and is confident that this reorganisation places it in a better position to capitalise on the eventual recovery of the leisure and hospitality sector as a whole.

Training & Development

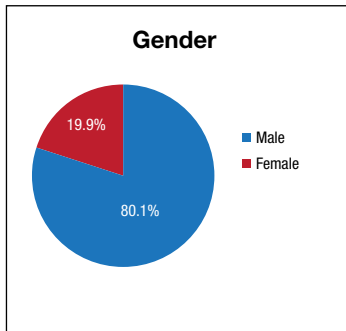
GRI 404-1, 404-2

Employee training hours averaged 33 hours per employee in 2021 compared to 50 training hours per employee in 2020. This is above the target of 16 hours per employee as set by the Group. Employees were provided targeted work-based training to operate in the new normal which included familiarising with Health Ministry's guidelines on health and safety post pandemic as well as handling equipment and various processes of sanitation.

With the aim of 'leaving no one behind, we aim to enhance employability of the workforce by cultivating talent competencies. Trainings have included reskilling and upskilling firstly to cope with the forms of work transitions

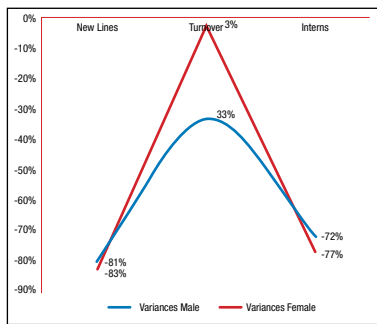
Sustainability Statement (Cont'd)

Gender Distribution



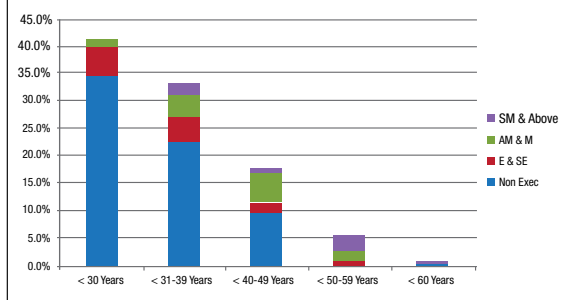
Mainly due to high turnover, the gender balance of female personnel decline to 20%. The Board's target is to increase female employees to 30% in the coming year.

Turnover



However, better gender participation and ethnic distribution particularly at the senior management level are areas of ongoing focus for improvement.

Age Group



The Group has a young talent pool with much potential and with the right training plans, can be groomed to become future leaders. The Group aims to continue investing in enhancing employability and resilience of the workforce considering changes in the economy and society in the wake of the pandemic crisis. With the aim of 'leaving no one behind, The Group aims to cultivate talent competencies to meet new normal and business goals. As such training opportunities will include reskilling and upskilling firstly to cope with the forms of work transitions once normal operations resume.

Annual Performance Appraisal

GRI 404-3

In support of continuous professional development, all employees' performances are appraised annually and documented to evaluate and assess strengths and gaps, assess potential and advance succession planning. Our goal is to ensure each employee meets the minimum training need of 16 hours for employees across all levels to ensure competency is at the highest level. 100% of employees received regular performance and career development reviews

Training Hours

Training Hours	LB & BTB	BDS	TBB	Natra	Anmon	Group
Total Training Hours	92	0	5459.91	4829.8	180.50	10552
Headcount	29	12	156	59	64	321
Average/person in Group						32.87

Training hours averaged at 33 hours per employee meeting the Group's KPI of minimum 16 hours per person.

Preferred Employer

The Group aims to become a preferred employer by 2025. In the coming years, we look forward into the implementation of HR tech solutions. Digitising processes and systems to harness accurate performance management of each staff, identify gaps and re-skill needs will ensure high competency levels, healthy career development and our ability to attract and retain top talent. It will also optimise performance management, capability building, succession planning and retention.

Sustainability Statement (Cont'd)

Employee Benefits, Welfare and Benefits

GRI 201-3, 202-1, 401-2, 405-2

In accordance with the Malaysia Employment Act 1955, the Group strives as part of ESG commitment to offer competitive benefits package on par with the industry market rate and designed to foster a healthy work-life balance and help employees plan and prepare for the future.

Type of Benefits	Details
Medical benefits	<ul style="list-style-type: none"> - Clinical - Dental - Executive medical check-up - Health Screening - Vaccine
Insurance	<ul style="list-style-type: none"> - Group Personal Accident Insurance - Death in service due to natural causes - Financial relieve
Travel-related benefits	<ul style="list-style-type: none"> - Mileage claims - Meal claims - Accommodations - Air Travel - Airport/ ferry and other transportation
Life insurance	<ul style="list-style-type: none"> - Group Term Life Insurance
Health care	<ul style="list-style-type: none"> - Company coverage for hospitalisation or co-payment for surgical
Disability and critical illness	<ul style="list-style-type: none"> - Group Personal Accident Insurance
Sabbatical, study or unpaid leave	<ul style="list-style-type: none"> - Available for full time employees depending on the request and to be evaluated by Management
Flexi work hours	<ul style="list-style-type: none"> - Post Covid, The Group has adopted a flexi work hour in its admin offices in Kuala Lumpur 7am – 3pm, 8am to 4pm, 9am to 5pm to avoid the rush hour crowding in public spaces in the city and public transport.
Housing	<ul style="list-style-type: none"> - Provided to employees in Employment in the Island
Meal	<ul style="list-style-type: none"> - Depending on the location and business unit, operations staff are entitled to a duty meal at the staff canteen
Retirement provision	<ul style="list-style-type: none"> - The Group offer higher EPF contribution at 16% for all fulltime employees in Malaysia, with additional 3% for executive who have worked above 3 years. - Retirement benefits in Indonesia according to legislations
Stock ownership	<ul style="list-style-type: none"> - All full-time employees are eligible to ESOS (Employee Share Option Scheme) with allocation that rewards long service, grade and performance.

Sustainability Statement (Cont'd)

Employees Are the Most Important Resource

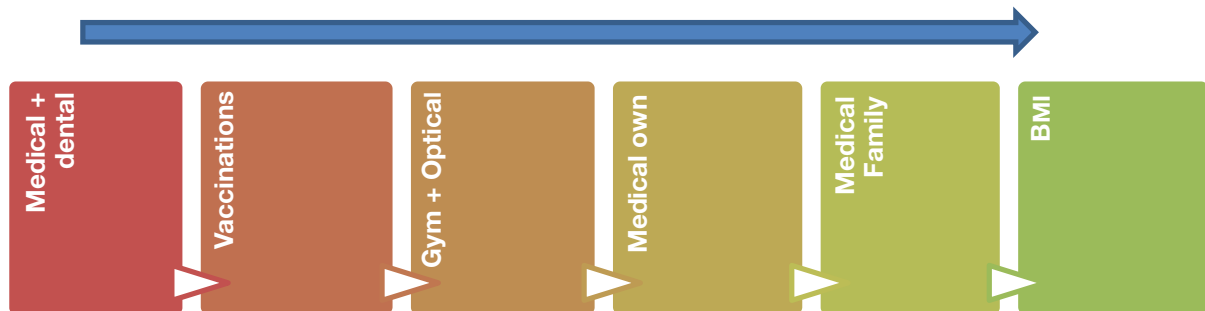
GRI 102-8, 405-1

Employees are instrumental in business success. A healthy corporate culture prepares the ground for employee well-being, low rates of sick leave and minimal employee turnover. While competitive compensation and benefits are important, as company with much focus on lifestyle and wellness, The Group recognises that strong balance of physical health, and mental and social wellbeing is vital to the long-term development of nation building and economic growth. As such, as part of the ESG considerations it is important to provide a supportive environment that empower and rewards responsible behaviours.

Journey to Wellness

A six point journey to reward yourself for a responsible year

“Journey to Wellness” program for employees was launched in June 2019 which truly embodies the Group’s vision and mission for healthy lifestyle as part of the Group’s ESG initiative. The Health Programme is gamified with cash back incentives if completed. The program encourages medical checks, vaccinations, gym, active lifestyle and family health to stay fit, healthy and productive.



<p>Minimum basic screening for Blood test i.e. sugar level BP, cholesterol etc</p> <p>Dental scaling/ cleaning And check up</p>	<p>As recommended by doctors, WHO, Min of Health e.g.: Meningitis, Flu, Pneumonia, Covid, Hepatitis which can spread to family and colleagues</p>	<p>Claims for gym fees, participation fees for Marathon, Spartan race, mountain climb or represent the company for related fitness events</p>	<p>Medical fees for out patient treatment for self and family</p>	<p>Healthy BMI (taken by company)</p>
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There is a significant improvement in employee participation in response to the medical plans campaign with 15.7% of employees making the effort to go for full medical check-up, 9.6% claiming for gym memberships and 4.6% participating in sports activities. The Group aims as its ESG initiative to have 100% participation of all employees particularly for prevention of diseases through vaccinations and annual medical screenings. Top scorers will receive vouchers for club or wellness memberships and services, supplements and other health related products aimed to promote wellness consciousness.

Sustainability Statement (Cont'd)

Supporting employees throughout pandemic

The COVID-19 pandemic brought disruption not only to the livelihoods, business and health of the global community, the prolonged lockdowns in 2021 and isolations, coupled with high infections earlier in the year pre-vaccines had caused much anxiety in the workplace. The Group provided support and continues to do so to ensure that all its employees remain engaged, committed, feel valued and maintain a work-life balance by giving them the support needed.

During the pandemic, the usual regular platforms for employees to interact was and is still not possible. Physical interaction and bonding events such as annual dinners, staff appreciation days, festive gatherings, training, townhalls and sports days where employees are recognised for outstanding contribution and other achievements celebrations have been cancelled for safety reasons. However, The Group has resorted to creative ways to engage with employees through teleconferencing.

Alongside the physical safety measures, we also stepped up our mental wellbeing support to assist employees and their families manage impact on everybody's daily lives. Our wellness division, V Integrated Wellness continued to provide online yoga, meditation and free digital mental health resources through social media. During Mental Health Awareness Week, we reached out to colleges working at home through delivery of care packages that consisted of healthcare products and launched a hotline for counselling.

Engagement	<ul style="list-style-type: none"> - Regular online townhalls, quarterly birthday celebrations and catch-ups - Festive gifts and care packs delivered to homes of employees
Infection prevention	<ul style="list-style-type: none"> - Mandatory body temperature and health screenings/registration are conducted for all employees reporting to work on a daily basis - Office-based employees are encouraged to work from home whenever possible. - Self - quarantine and work from home policies in place
Health status declaration	<ul style="list-style-type: none"> - Only fully vaccinated employees are allowed to return to work - All employees must declare and register their health on the national tracking apps - Only fully vaccinated customers and vendors after registration are allowed into the premises - Full compliance to cleaning, sanitizing and disinfection with WHO standards in all premises

Sustainability Statement (Cont'd)

Provision of personal protective equipment	<ul style="list-style-type: none"> - Providing hand sanitisers to staff for personal use and in common areas, locker rooms, timeclock and check-in areas, restrooms, back of house, lift areas and all employee cafeterias. - Providing appropriate Personal Protective Equipment face masks, shields and gloves for front liners.
Financial aid	<ul style="list-style-type: none"> - Provided funds and essential household provisions such as rice, canned food and supplements to struggling families - Provided face masks and sanitisers to families that were impacted by salary cuts and job losses
Mental Health Support	<ul style="list-style-type: none"> - On-line yoga and meditation support - Mental health week outreach

Giving our people a voice

The Group as an ESG initiative encourages open dialogue by constantly engaging with employees to seek their views and understand their needs. Employee surveys are conducted regularly, maintaining anonymity so everyone is able to express views without fear. This openness approach identifies the strengths and weaknesses for the employer along with any areas for improvement. The findings from the employee survey are analysed and action plans formulated for long-term, strategic development of policies, benefits and work

Training

All employees at the Group's operating units receive regular trainings coordinated in-house as part of compliance to local laws to respond effectively to emergencies and pandemic diseases in particular. This are for the well-being of our guests and visitors which includes Cardio Pulmonary Resuscitation (CPR), first-aid training and practical training on the usage of fire extinguishers food safety, hygiene and sanitation and fire safety.

Compliance and Safety Managers are responsible to lead and implement procedures and efforts in identifying workplace hazards, reducing accidents and exposure to harmful situations and substances for the protection our guests and visitors. The Safety and Health Committee has also been formed to lead training of personnel in accident prevention, accident response, emergency preparedness and use of protective tools and equipment.

Sustainability Statement (Cont'd)

CORPORATE GOVERNANCE

GRI 102-18



The Group practises sound corporate governance with structures established to ensure business is conducted in a sustainable and responsible manner by heeding with prevailing ESG requirements. Good corporate governance not only bolsters investor confidence but also improves performance as business is conducted ethically. The Board Charter, T.R.U.S.T Policy underpinning our Anti-Bribery Management System, Whistleblowing Policy, ESG Charter and Code of Conduct and Ethics outline the company’s vision for solid corporate governance. The group bolster this further by applying from the Malaysian Code on Corporate Governance (MCCG) three broad principles namely Board Leadership and Effectiveness, Effective Audit & Risk Management and Integrity in Corporate Reporting and Meaningful Relationships with Stakeholders.

A culture of compliance is fundamental in protecting our values and market reputation. A strong corporate culture is required to ensure all core values in particular ESG considerations are embraced and this extends beyond staff to all our business associates who can expose us to reputational damage and other negative consequences.

The Group continues to seek solutions to minimise the impact of its operations with government and authorities by limiting its political engagement to memberships of industry and associations where possible. Senior Management and stakeholders are appointed according to their areas of qualification and involvement to engage in dialogue and support primarily with a focus is on industry advancement initiatives and in developing the hospitality industry and tourism landscape.

One way of ensuring this, is to focus on increasing transparency and openness in contacts between the company and shareholders on issues such as board composition by updating to the requirements of the MGCC, conflict of interest procedures and shareholder rights.

Along with active corporate governance in place, The Group acts in accordance with its statutory or regulatory requirements as a minimum. Employees are expected to comply with all relevant laws in each respective jurisdiction. This will ensure The Group is able to provide long-term benefits for its shareholders, employees, suppliers, customers and society at large.

GRI 415-1

No political contributions are made by the Group or the company to candidates for public office or political parties and corporate funds are never used for independent political expenditures.

Sustainability Statement (Cont'd)

Risk Management and Internal Control Framework

GRI 102-30

The Board is responsible for the Group's risk management framework and system of internal control and for monitoring and reviewing their adequacy and integrity as its ESG committee. The Board affirms its overall responsibility for establishing an effective risk management and internal control framework that has been enhanced over the years.

The Group's internal control and risk management framework are designed to manage and eliminate risks and to provide reasonable but not absolute assurance against any material misstatement or loss.

Communications with Stakeholders and the Investing Community

The Group places great importance on timely, accurate and equal dissemination of information to shareholders and the investing community which are part of its ESG commitments. Regular briefings, emails and townhalls are held to present its quarterly results following their release on Bursa Malaysia Securities' website. The briefing includes a Q&A session, which updates sell-side research analysts on significant events and helps them understand the company in greater depth.

The Group's corporate website, www.landmarks.com.my, provides the public with key information on business activities.

Code of Ethics

The Group's Code of Conduct and Ethics applies to all employees and Directors of the Group and its subsidiaries. This Code is disseminated to employees through its cloud-based portal – Sharepoint, along with other related policies, procedures and guidelines of the Group. These documents outline the principles that guide standards of behaviour and business conduct for employees and directors inter se and for dealing with third parties, which are to be incorporated into everyday management and dealings. In addition, the directors observe the Company Directors' Code of Ethics established by the Companies Commission of Malaysia.

Whistleblowing Policy

GRI 102-17

The Group strives to meet highest possible standards of ethical, moral and legal business conduct and practices, openness and accountability in all business operations. Our Whistleblowing Policy aims to provide a discreet process for reporting and managing any suspected detrimental action and improper conduct. By providing a mechanism for stakeholders to report their concerns freely and without fear of reprisal or intimidation if they act in good faith through our suggestion boxes located in the admin offices, discreet disclosures and through periodic surveys online.

No action will be taken against any whistleblowers making a complaint or report in good faith. However, only genuine concerns of a serious or sensitive nature should be reported rather than trivial, frivolous or general grievances. Any confidential information will not be disclosed without the written consent of the whistleblower.

T.R.U.S.T. Policy and Anti-Bribery Management System / Corruption

GRI 205-1, 205-2

The Group's commitment to integrity and transparency is clearly stated in the Employee Handbook and Code of Ethics. These documents outline the integrity by which business is conducted. Anyone found to have been involved in such acts are subject to disciplinary action that may lead to termination.

Sustainability Statement (Cont'd)

A keen understanding of corruption risk exposure is the cornerstone of an effective anti-corruption compliance programme. Therefore, it is vital that The Group clarifies its position on both to employees, contractors, suppliers and all others connected to the business. Landmarks had set up its T.R.U.S.T. Policy and Anti-Bribery Management System as part of its governance to deter bribery and protect itself against bribery and corruption. A series of internal control measures have been put in place including training and briefing to all employees on policies.

The highest ethical standards are followed when doing business and all forms of corruption are forbidden including:

- Bribery
 - Fraud
 - Money laundering
 - Embezzlement
 - Obstruction of justice
 - Trading in influence
- Bribery and corruption present a significant risk to all business units.

There have been no major disciplinary cases reported for corrupt practices that resulted in the dismissal of employees. The Group has not been subjected to any fines and penalties arising from corruption cases from the authorities during the recent years and reporting period.

CONCLUSION

While we have made a lot of progress over the years in our contributions to sustainability by our conservation efforts and in managing waste reduction, expectations continue to rise as can be seen by the formation of the ESG Committee for a more formulated approach towards achieving integrated sustainability as our corporate social responsibility to encompass relevant ESG factors into account.

The Group aims to encourage continuous innovation and invest in green ideas that supports waste reduction, energy conservation and carbon emission to reduce environmental impacts while growing the top line. We will also have to re-focus our sustainability regimes to improve on the other aspects of ESG considerations to benefit our stakeholders especially, our valued employees upon whom our financial performance and wellbeing rests with as a hospitality provider.

We are conscious that ESG covers a wide spectrum of activities and matters which are material to the Group as a responsible corporate entity to sustain in all its operations in the interest of its stakeholders. We will resist complacency and ensure that we continue to improve our sustainability performance and join leading companies and taskforces in continuously contributing to meaningful sustainable development and in mitigating like climate change through mindful actions and other ESG factors.

Statement was approved by the Board of Directors on 23 February 2022.